CHAPMAN AND CUTLER

In our opinion interest on said bonds is seempt from present federal income taxes under existing federal laws, regulations, decisions and interpretations.

We further certify that we have examined executed bond number one and find the same in due form of law and in our opinion said in due form one said community School District binding upon said Community School District of North Scott and all taxable property in said School District is subject to the levy of taxes sufficient to pay the same without limitation as to rate.

In expressing such opinion we have considered the litigation pending in various states, including lowa, such as Serano v. Priest in California, challenging the constitutionality of present systems of levying taxes and applying funds for public school purposes, and the conclusions above stated are not modified or qualified in any respect thereof, whether or not stitutional, system is ultimately held unconstitutional.

It is hereby certified that the following is a correct and complete copy of the text of the lagal opinion of Messrs. Chapman and Cutler, legal opinion of Messrs. Chapman and Cutler, Attorneys, Chicago, Illinois, regarding the issue of which the within bond is one, the original of of which opinion was manually executed, dated and issued as of the date of the delivery of and payment for said bonds, and a copy of which is on file with the undersigned. Secretary, Board of Dir Community School District of North

We hereby certify that we have examined certified copy of the Community School District of Directors of the proceedings of the Board certified School District of Directors of the School District of Directors of the School Building Bonds to the amount of its School Building Bonds to the amount of \$1,200,000, dated February 1, 1974, fenomination \$500,000 unmbered from 1 to 240, inclusive, of which bonds numbered 1 to 341, inclusive, of which bonds numbered 1 to 341, inclusive, bear interest at the rate of Four and seventy-hundredths percent per annum, bonds numbered 32 to 65, inclusive, bear interest at the rate of Four and one-half per cent per annum, bonds numbered 66 to 123, inclusive, bear interest at the story for and sixty-hundredths per cent per annum, and one-half per cent per annum, and bonds numbered 124 to 181, inclusive, bear and why 1 of aead of the years 1976 to 1988, inclusive, and we are of the opinion that such proceedings show lawful authority for said issue under the laws of the State of lower numbers.

COMMUNITY SCHOOL DISTRICT OF NORTH SCOTT

UNITED STATES OF AMERICA STATE OF 10WA COUNTY OF SCOTT

4.70%

SCHOOL BUILDING BOND

DATED FEBRUARY 1, 1974 DUE MAY 1, INTEREST PAYABLE

NOVEMBER 1, 1974 AND SEMIANNUALLY THEREAFTER ON MAY 1 AND NOVEMBER 1

SCHOOL DISTRICT TREASURER PAYABLE AT THE OFFICE OF THE PRINCIPAL AND INTEREST

ELDRIDGE, IOWA

STATE OF IOWA COUNTY OF SCOTT

SS

I, the undersigned, County Auditor of Scott County, lowa, do hereby certify that the within bond has been duly recorded in a book in my office as required by Section 298.22 of the Code of Iowa.

Witness my official signature and the seal of said County as of the first day of February, 1974.

SPECIMEN

	SIGNATURE OF SCHOOL TREASURER
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